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Attorneys for Plaintiffs Tremaine Wilson and Lauren Becker

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TREMAINE WILSON and LAUREN
BECKER, individually, and on behalf of other
members of the general public similarly
situated, and as aggrieved employees pursuant
to the Private Attorneys General Act
("PAGA"),

Plaintiff,

vs.

SKYWEST AIRLINES, INC., a Utah
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 3:19-cv-1491-VC

**JOINT STIPULATION RE SECOND
AMENDED CLASS ACTION
COMPLAINT; ~~PROPOSED~~ ORDER**

AS MODIFIED

Plaintiffs Tremaine Wilson and Lauren Becker ("Plaintiffs"), on the one hand, and
Defendant SkyWest Airlines, Inc. ("Defendant") on the other, hereby stipulate as follows:

WHEREAS, the Parties have met and conferred regarding the appropriate class definition
as determined by the most current and best available factual and legal information available to
Plaintiff at this stage in the proceedings;

WHEREAS, the Parties have specifically met and conferred regarding the recent
California Supreme Court rulings in *Ward v. United Airlines, Inc.* and *Oman v. Delta Air Lines*,

1 *Inc.*, and those decisions' import to 1) the appropriate class definition and 2) Plaintiffs' claim for
2 unpaid overtime;

3 WHEREAS, Plaintiffs have expressed an intention to amend the Complaint to update the
4 class definition and dismiss their cause of action for unpaid overtime based on the *Ward* and
5 *Oman* decisions;

6 WHEREAS, the Parties have met and conferred regarding the filing of an amended
7 complaint in the above-captioned action, which will amend the currently-plead class definition
8 and remove Plaintiff's First Cause of Action for unpaid overtime;

9 **THEREFORE, IT IS HEREBY STIPULATE AND AGREED BY THE PARTIES**
10 **HERETO, THROUGH THEIR RESPECTIVE COUNSEL, AS FOLLOWS:**

11 The parties hereby stipulate to allow Plaintiffs leave to file the Second Amended
12 Complaint attached to this Stipulation and [Proposed] Order as Exhibit "A."

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14 **DATED:** September 29, 2020

THE BAINER LAW FIRM

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16 By /s/ Matthew R. Bainer

MATTHEW R. BAINER

Attorneys for Plaintiffs

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21 **DATED:** September 29, 2020

JONES DAY

22 By /s/ Amanda C. Sommerfield

23 AMANDA C. SOMMERFIELD

Attorneys for Defendant

24 SKYWEST AIRLINES, INC.
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Matthew R. Bainer, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29th day of September, 2020, at Oakland, California.

/s/ Matthew R. Bainer

MATTHEW R. BAINER

~~[PROPOSED]~~ ORDER

Having read and considered the above stipulation, and good cause appearing therefor:

The above stipulation is approved. It is ordered that Plaintiffs shall have leave to file the attached Second Amended Class Action Complaint in the above-entitled matter. ~~The clerk is directed to file that pleading forthwith, and it shall be deemed filed and served as of the date of this Order.~~ Plaintiffs shall file the Second Amended Complaint on the docket within 7 days.

IT IS SO ORDERED.

DATED: October 2, 2020

